

1 PHILLIP A. TALBERT
United States Attorney
2 ALYSON A. BERG
Assistant U.S. Attorney
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5
6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$153,292.68 SEIZED
FROM TD AMERITRADE ACCOUNT
15 NUMBER 871186505, HELD IN THE
NAME OF SOHAIL MAMDANI,

16 APPROXIMATELY \$50,000.00 SEIZED
FROM TD AMERITRADE ACCOUNT
17 NUMBER 871186505, HELD IN THE
NAME OF SOHAIL MAMDANI,

18 APPROXIMATELY \$110,650.00 SEIZED
FROM E*TRADE ACCOUNT NUMBER
19 XXXXXX9720, HELD IN THE NAME OF
SOHAIL MAMDANI,

20 APPROXIMATELY \$3,091.85 SEIZED
FROM E*TRADE ACCOUNT NUMBER
21 XXX-X1621, HELD IN THE NAME OF
SOHAIL MAMDANI,

22 APPROXIMATELY \$78,094.91 SEIZED
FROM WELLS FARGO BANK
23 ACCOUNT NUMBER 1678973486, HELD
IN THE NAME OF SOHAIL MAMDANI,
24
25
26
27
28

CASE NO. 1:22-MC-00159-JLT

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

1 APPROXIMATELY \$4,536.19 SEIZED
2 FROM JPMORGAN CHASE ACCOUNT
3 NUMBER 586170398, HELD IN THE
NAME OF MAMDANI GARCIA MD,
INC.,

4 APPROXIMATELY 192945.439 IN U.S.
5 DOLLAR COIN SEIZED FROM
6 BLOCKFI TRADING WALLET NUMBER
0x2A549b4AF9Ec39B03142DA6dC32221f
C390B5533, IN THE NAME OF SOHAIL
MAMDANI,

7 APPROXIMATELY 134297.6 GEMINI
8 DOLLARS SEIZED FROM BLOCKFI
9 TRADING WALLET NUMBER
0x2A549b4AF9Ec39B03142DA6dC32221f
C390B5533, IN THE NAME OF SOHAIL
10 MAMDANI,

11 APPROXIMATELY 10.61 ETHEREUM
12 SEIZED FROM COINBASE INC.
13 WALLET NUMBER
0xddfAbCdc4D8FfC6d5beaf154f18B778f8
92A0740 IN THE NAME OF SOHAIL
MAMDANI,

14 APPROXIMATELY 0.05488792 BITCOIN
15 SEIZED FROM BLOCKFI TRADING
16 WALLET NUMBERS
3H1ozzymNMkMqyX76GgKvVTevPgv4qt
s53 AND 3DZSLujDgiVT6dxnMxfVYS1
17 PnijwBnQ3aE IN THE NAME OF SOHAIL
MAMDANI, and

18 APPROXIMATELY 2.04560196 BITCOIN
19 SEIZED FROM COINBASE INC.
20 WALLET NUMBER 34asaQDNxud4CRgm
qfVAF1GJsvyWNepenB IN THE NAME
OF SOHAIL MAMDANI,

21 Defendants.
22
23

24 It is hereby stipulated by and between the United States of America and potential claimant Sohail
25 Hussain Mamdani (“claimant”), by and through their respective counsel, as follows:

26 1. On or about August 1, 2022, claimant filed timely claims in the administrative forfeiture
27 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$50,000.00 seized
28 from TD Ameritrade account number 871186505, held in the name of Sohail Mamdani, Approximately

1 \$110,650.00 seized from E*Trade account number XXXXXX9720, held in the name of Sohail Mamdani,
 2 Approximately \$3,091.85 seized from E*Trade account number XXX-X1621, held in the name of Sohail
 3 Mamdani, Approximately \$4,536.19 seized from JPMorgan Chase account number 586170398, held in
 4 the name of Mamdani Garcia MD, Inc., Approximately \$78,094.91 seized from Wells Fargo Bank
 5 account number 1678973486, held in the name of Sohail Mamdani, Approximately 192945.439 In U.S.
 6 Dollar Coin seized from BlockFi Trading wallet number 0x2A549b4AF9Ec39B03142DA6dC
 7 32221fC390B5533, in the name of Sohail Mamdani, Approximately 134297.6 Gemini Dollars seized
 8 from BlockFi Trading wallet number 0x2A549b4AF9Ec39B03142DA6dC32221fC390B5533, in the
 9 name of Sohail Mamdani, Approximately 10.61 Ethereum seized from Coinbase Inc. wallet number
 10 0xddfAbCdc4D8FfC6d5beaf154f18B778f892A0740, in the name of Sohail Mamdani, Approximately
 11 0.05488792 Bitcoin seized from BlockFi Trading wallet numbers 3H1ozzymNMkMqyX76GgKvVTev
 12 Pgv4qts53 and 3DZSLujDgiVT6dxnMxfVYS1PnijwBnQ3aE in the name of Sohail Mamdani, and
 13 Approximately 2.04560196 Bitcoin seized from Coinbase Inc. wallet number
 14 34asaQDNxud4CRgmqfVAF1GJsvyWNepenB in the name of Sohail Mamdani, which were seized on
 15 April 25, 2022, and Approximately \$153,292.68 seized from TD Ameritrade account number 871186505,
 16 held in the name of Sohail Mamdani, which was seized on May 20, 2022 (hereafter collectively
 17 “defendant assets”).

18 2. The Federal Bureau of Investigation sent the written notice of intent to forfeit required by
 19 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
 20 claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant filed
 21 a claim to the defendant assets as required by law in the administrative forfeiture proceeding.

22 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
 23 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are
 24 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
 25 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
 26 That deadline was October 30, 2022.

27 4. By Stipulation and Order filed October 31, 2022, the parties stipulated to extend to
 28 December 9, 2022, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
2 to forfeiture.

3 5. By Stipulation and Order filed December 8, 2022, the parties stipulated to extend to
4 January 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
6 to forfeiture.

7 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
8 January 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject
10 to forfeiture.

11 7. Accordingly, the parties agree that the deadline by which the United States shall be
12 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment
13 alleging that the defendant assets are subject to forfeiture shall be extended to January 30, 2023.

14 Dated: January 13, 2023

PHILLIP A. TALBERT
United States Attorney

16 By: /s/ Alyson A. Berg
17 ALYSON A. BERG
Assistant U.S. Attorney

19 Dated: January 13, 2023

/s/ Kevin P. Rooney
KEVIN P. ROONEY
Attorney for claimant
Sohail Hussain Mamdani
(As authorized by telephone on 1/13/23)

22 IT IS SO ORDERED.

24 Dated: **January 13, 2023**


UNITED STATES DISTRICT JUDGE